Filed 06/09/25

Page 1 of 4

Case 2:24-cv-00651-DC-SCR Document 33

LITTLER 28
MENDELSON, P.C.
5200 North Palm
Avenue
Suite 302
Fresno, CA
93704.2225
5559 244 7500

JOINT STIP. AND [PROPOSED]
ORDER TO CONTINUE EXPERT
DISCOVERY CUT OFF DEADLINE
Error! Unknown document property name.

Error! Unknown document property name.

CASE NO. 2:24-CV-00651-DC-SCR

1

2

45

67

8

9

1011

1213

1415

1617

18

1920

21

22

23

24

25

26

27

LITTLER 28
MENDELSON, P.C.
5200 North Palm
Avenue
Suite 302
Fresno, CA
93704 2225

559 244 7500

## **STIPULATION**

Plaintiff Byron Scheafer ("Scheafer") and Defendant Target Corporation ("Defendant") (collectively, "the Parties"), by and through their respective counsel of record, hereby stipulate and agree to the following:

WHEREAS, on May 9, 2024, the Court issued a Scheduling Order [DOC. 14] which ordered that all expert discovery be completed no later than July 4, 2025;

WHEREAS, the Parties have met and conferred regarding mutually agreeable dates to schedule expert witness depositions;

WHEREAS, the Parties were unable to reach mutually agreeable dates to schedule Defendant's expert witness deposition prior to the July 4, 2025 expert discovery deadline;

WHEREAS, Defendant offered its expert witness Erik Volk for a deposition for two (2) alternative dates in June however Plaintiff's Counsel was unable to accommodate the dates offered; therefore, Mr. Volk will be made available for a remote deposition to occur on July 7, 2025;

**WHEREAS,** pursuant to the Parties' agreement to jointly stipulate to extend the expert discovery cutoff deadline for fourteen (14) days to July 18, 2025.

[SIGNATURES ON FOLLOWING PAGE]

JOINT STIP. AND [PROPOSED] ORDER TO CONTINUE EXPERT DISCOVERY CUT OFF DEADLINE

Error! Unknown document property name.

Error! Unknown document property name.

2

	Case 2:24-cv-00651-DC-SCR	Document 33 Filed 06/09/25 Page 3 of 4
1	IT IS SO STIPUI	LATED.
2		
3	Dated: June 9, 2025	LAW OFFICES OF JILL P. TELFER
4		
5		
6		Jill P. Telfer
7		Attorneys for Plaintiff BYRON SCHEAFER
8 9		
10	Dated: June 9, 2025	LITTLER MENDELSON, P.C.
11		
12		Andrew H. Woo
13		Michael L. Kibbe Zoe Y. J. Monty-Montalvo
14		
15		Attorneys for Defendant TARGET CORPORATION
16		
17		
18		
19		
20		
21		
22		
23		
<ul><li>24</li><li>25</li></ul>		
26		
27		
ER 28 DN, P.C. h Palm ue	JOINT STIP. AND [PROPOSED] ORDER TO CONTINUE EXPERT	3 CASE NO. 2:24-CV-00651-DC-SCR

LITTLER 28
MENDELSON, P.C.
5200 North Palm
Avenue
Suite 302
Fresno, CA
93704.2225
559.244.7500

JOINT STIP. AND [PROPOSED] ORDER TO CONTINUE EXPERT DISCOVERY CUT OFF DEADLINE

Error! Unknown document property name. Error! Unknown document property name.

CASE NO. 2:24-CV-00651-DC-SCR

LITTLER 28
MENDELSON, P.C.
5200 North Palm
Avenue
Suite 302
Fresno, CA

93704.2225

559.244.7500

JOINT STIP. AND [PROPOSED] ORDER TO CONTINUE EXPERT DISCOVERY CUT OFF DEADLINE